

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re: : Chapter 11  
Creekside Associates, Ltd., : Case No. 14-19952 (SR)  
Debtor. :  
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**MOTION OF CREEKSIDER JV OWNER, LP TO  
DISMISS THE CHAPTER 11 BANKRUPTCY CASE  
PURSUANT TO BANKRUPTCY CODE SECTIONS 105, 1112(b) AND 305(a)**

For the reasons set forth in the accompanying Memorandum of Law and pursuant to Bankruptcy Code Sections 105, 1112(b) and 305(a), by and through their undersigned attorneys, Creekside JV Owner, LP respectfully moves for dismissal of this Chapter 11 bankruptcy case, Case No. 14-19952, on one or more of the following grounds: (i) the case has not been filed in good faith; (ii) the debtor is unable to confirm a Plan; and (iii) the interests of creditors and the debtor would be better served by dismissal.

WHEREFORE, Creekside JV Owner, LP respectfully requests that the Court dismiss this Chapter 11 bankruptcy case, No. 14-19952, in its entirely.

Dated: March 27, 2015

Respectfully submitted,

/s/ John C. Goodchild, III  
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